

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.
(Princeton and Elk River, Minnesota)

TO: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

SUPPLEMENT TO COMMENTS
OF MILESTONE RADIO, LLC

Milestone Radio, LLC ("Milestone"), licensee of FM broadcast station KLCI, Princeton, Minnesota, by its attorneys, hereby supplements its Comments, filed January 19, 1999, in the above-captioned unopposed proceeding, to include the attached Engineering Statement. The sole purpose and effect of this submission is to supply gain and loss data associated with the rulemaking proposal under consideration.

Respectfully submitted,

MILESTONE RADIO, LLC

By: Anne Thomas Paxson
Anne Thomas Paxson
Its Attorney

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March 24, 1999

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**ENGINEERING STATEMENT IN
SUPPORT OF SUPPLEMENTAL
COMMENTS**

MM DOCKET 98-208

CHANNEL 291C2 - ELK RIVER, MN

**Milestone Radio, LLC
Princeton, MN**

March 24, 1999

**Prepared for: Mr. Dennis Carpenter
Milestone Radio, LLC
15395 91st Avenue, North
Maple Grove, MN 55369**

CARL E. SMITH CONSULTING ENGINEERS

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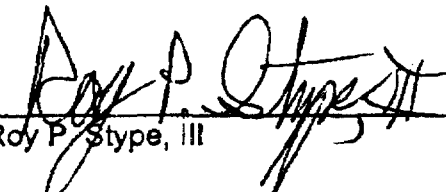
Table 1.1 - Partial Listing of Stations
Providing Full Time Service
to KLCI Gain and Loss Areas

ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)

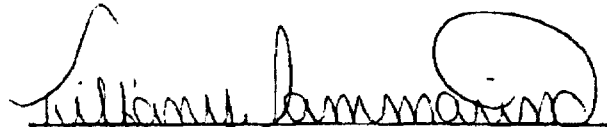
Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by Milestone Radio, LLC, to prepare the attached "Engineering Statement in Support of Supplemental Comments - MM Docket 98-208 - Channel 291C2 - Elk River, MN."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Roy P. Stype, III

Subscribed and sworn to before me on **March 24, 1999.**



Notary Public

TIFFANY IAMMARINO
Notary Public, State of Ohio, Cuy. Cty.
My Commission Expires Nov. 2, 2003

/SEAL/

ENGINEERING STATEMENT

This engineering statement is prepared on behalf of Milestone Radio, LLC, licensee of Radio Station KLCI - Princeton, Minnesota, and proponent of MM Docket 98-208, which proposes to reallocate Channel 291C2 from Princeton, Minnesota, to Elk River, Minnesota, and modify the license of KLCI to specify operation on Channel 291C2 in Elk River. It supports supplemental comments in this proceeding and supplies additional information requested in the Notice of Proposed Rulemaking ("NPRM") in this proceeding.

Although it is not actually proposed to relocate the KLCI transmitter site, it was necessary to specify reference coordinates for Channel 291C2 in Elk River which differ from those of the presently licensed KLCI transmitter site, due to the fact that the present KLCI operating facilities were authorized from a short spaced site under the FCC's contour protection rules. Paragraph 3 of this NPRM requests the submission of additional data regarding the gain and loss areas associated with this proposal, based on the assumption that KLCI would operate from the proposed Elk River reference coordinates. Figure 1.0 is a map exhibit depicting the present and proposed KLCI 1 mV/m contours, as well as the associated gain and loss areas. The present contour assumes operation with the licensed effective radiated power of 30 kilowatts at 184 meters above average terrain utilizing the licensed directional pattern, while the proposed contour assumes operation with a nondirectional effective radiated power of 50 kilowatts at 150 meters above average terrain from the Elk River reference coordinates. Pursuant to FCC policy at the rulemaking stage, both of these contours were projected assuming uniform terrain. Table 1.0 presents detailed data on the present and proposed popula-

tions and areas, as well as the gain and loss areas. All population data presented in this table is based on the 1990 U. S. Census.

Studies were then conducted to identify other stations which provide full time aural service to the gain or loss areas. For all FM stations, uniform terrain was assumed and all classes of stations were assumed to provide service to their 1 mV/m contour, pursuant to FCC policy. All commercial FM stations and noncommercial educational FM stations operating in the nonreserved band (except for Class D stations, which were not considered at all in these studies), with the exception of Class A and Class C stations, were assumed to be operating with the maximum facilities permitted for their class. Calculations for commercial Class C stations and all noncommercial educational FM stations operating in the reserved band, except Class D, were based on the stations' actual notified operating facilities. Class A stations were considered to be operating with the greater of their actual operating facilities or the former Class A maximum of 3 kilowatts effective radiated power at 100 meters above average terrain. All AM contours were projected utilizing the notified nighttime facilities for each station and conductivity data from FCC Figure M3. Class A AM stations were considered to provide service to their 0.5 mV/m groundwave contours, while all other AM stations were considered to provide service to their nighttime interference free contour, as defined by Section 73.182 of the FCC Rules. Class D AM stations operating at night with sub-minimum facilities were not considered in these studies, due to the fact that these stations operate on a secondary basis at night and are considered by the FCC to be daytime only stations, in spite of their limited nighttime facilities.

These studies determined that all portions of these gain and loss areas receive at least five other full time aural services, with most portions receiving well in excess of

five other full time aural services. Table 1.1 is a tabulation of the stations which were examined to determine that all portions of these gain and loss areas receive a minimum of at least five other full time services. It should be noted that other stations, in addition to those listed in Table 1.1, also provide full time aural service to portions of these gain and loss areas, but have not been listed, due to the fact that these studies were only carried to the point necessary to verify the existence of at least five other full time aural services to all portions of these loss and gain areas and made no attempt to determine the exact number of other full time aural services in excess of five to any portion of these areas.

As shown by this data, the entire KLCI gain and loss areas are well served, receiving at least five other full time aural services. Thus, the small loss area associated with the modifications proposed in this proceeding should not be an impediment to the proposed change in the KLCI community of license.

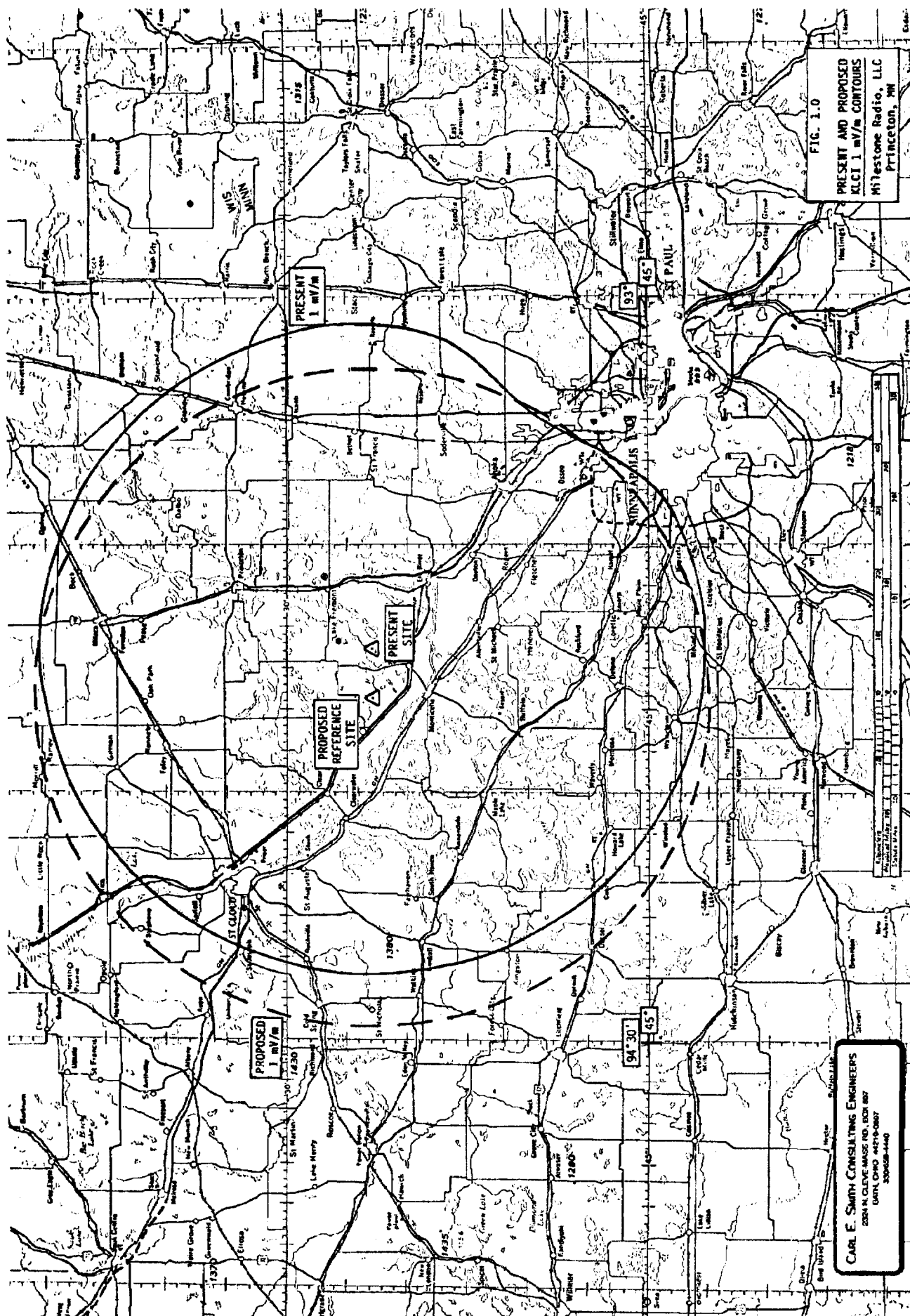


TABLE 1.0

PRESENT AND PROPOSED
KLCI AREA AND POPULATION

Milestone Radio, LLC
Princeton, MN

| | <u>Area</u> <u>(Square Kilometers)</u> | <u>Population</u> <u>(1990 Census)</u> |
|----------------|---|---|
| Present | 8,114.9 | 675,780 |
| Gain | 1,014.7 | 26,468 |
| Loss | 570.7 | 56,706 |
| Proposed | 8,558.9 | 645,542 |
| Net Gain(Loss) | 444.0 | (30,238) |

TABLE 1.1

PARTIAL LISTING OF STATIONS
PROVIDING FULL TIME SERVICE
TO KLCI GAIN AND LOSS AREAS

Milestone Radio, LLC
Princeton, MN

| <u>Call</u> | <u>Frequency/ Channel</u> | <u>Location</u> |
|-------------|-------------------------------|--------------------------|
| WCCO | 830 | Minneapolis, MN |
| KNSR | 205C1 | Collegeville, MN |
| KSJR-FM | 211C1 | Collegeville, MN |
| KNOW-FM | 216C | Minneapolis-St. Paul, MN |
| KQRS-FM | 223C | Golden Valley, MN |
| KKJM | 225C3 | St. Joseph, MN |
| KXXR | 229C | Minneapolis, MN |
| KSTP-FM | 233C | St. Paul, MN |
| KMXK | 235C2 | Cold Spring, MN |
| KBEK | 238C3 | Mora, MN |
| KARP | 242C2 | Glencoe, MN |
| KKSR | 244C2 | Sartell, MN |
| KTCZ-FM | 246C | Minneapolis, MN |
| WWJO | 251C | St. Cloud, MN |
| KTIS-FM | 253C | Minneapolis, MN |
| KZPK | 255C2 | Paynesville, MN |
| KSJN | 258C | Minneapolis, MN |
| WRQC | 262C1 | Minneapolis, MN |
| KIKV-FM | 264C1 | Alexandria, MN |
| WCMP-FM | 265C3 | Pine City, MN |
| KDWB-FM | 267C | Richfield, MN |
| WHMH-FM | 269C2 | Sauk Rapids, MN |

TABLE 1.1 (cont'd)

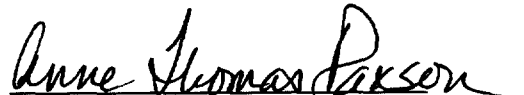
| <u>Call</u> | <u>Frequency/ Channel</u> | <u>Location</u> |
|-------------|-------------------------------|--------------------|
| KEEY-FM | 271C | St. Paul, MN |
| KQIC | 273C1 | Willmar, MN |
| WLTE | 275C | Minneapolis, MN |
| KLZZ(CP) | 279C3 | Waite Park, MN |
| WXPT | 281C1 | St. Louis Park, MN |
| KCLD-FM | 284C | St. Cloud, MN |
| KZNT | 287C3 | Cambridge, MN |
| KKJR(CP) | 295C3 | Dassel, MN |
| KLIZ-FM | 298C1 | Brainerd, MN |
| KQQL | 300C | Anoka, MN |

CERTIFICATE OF SERVICE

I, Anne Thomas Paxson, hereby certify that a true copy of the foregoing Supplement to Comments of Milestone Radio, LLC, was this 24th day of March 1999, hand delivered to each of the following

John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A266
Washington, DC 20554

Kathleen Scheuerle, Attorney
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A247
Washington, DC 20554

A handwritten signature in cursive script that reads "Anne Thomas Paxson". The signature is written in dark ink and is positioned below the typed names of the recipients.